UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRITT'NI FIELDS, individually and on behalf of other persons similarly situated who were employed by SONY MUSIC ENTERTAINMENT,

Plaintiffs.

- against -

SONY MUSIC ENTERTAINMENT, and/or any other entities affiliated with or controlled by SONY MUSIC ENTERTAINMENT,

Defendants.

Case No. 13-CV-6520 (GBD)

PROPOSED CIVIL CASE MANAGEMENT PLAN AND SCHEDULING ORDER

This Civil Case Management Plan and Scheduling Order is submitted by the parties in accordance with Federal Rules of Civil Procedure 16 and 26(f).

- 1. This matter shall be consolidated with the related matter of *Moreno v. Sony Music Entertainment*, *et al.*, Docket No. 13-CV-5708 (GBD) for discovery purposes only. No later than 14 days following the close of fact discovery, the parties shall discuss the extent, if any, to which this case is to be further consolidated with the *Moreno* matter for purposes other than discovery.
- 2. All parties do not consent to conducting further proceedings before a Magistrate Judge, including motions and trial, pursuant to 28 U.S.C. § 636(c).
- 3. No amendment to the pleadings will be permitted after November 15, 2014.
- 4. The parties must complete discovery relating to class certification issues by May 15, 2015.
- 5. Except for good cause shown, all discovery shall be completed by October 15, 2015. The discovery completion date shall not be adjourned except upon a showing of extraordinary circumstances.
- 6. Dispositive motions are to be served by November 16, 2015. Answering papers are to be served within 30 days. Reply papers are to be served within 21 days. In the event a dispositive motion is made, the date for submitting the Joint Pretrial Order shall be changed from that shown herein to three (3) weeks from the decision on the motion. The final Pretrial Conference shall be adjourned to a date four (4) weeks from the decision on the motion.
- 7. A final pretrial conference will be held on December 15, 2015.
- 8. The Joint Pretrial Order shall be filed no later than December 22, 2015.

- 9. All motions and applications shall be governed by the Court's Individual Rules of Practice.
- 10. The parties shall be ready for trial within 48 hours, notice on or after February 1, 2016. The estimated trial time is 10 days, and this is a non-jury trial.
- 11. The next Case Management Conference will be held on January 7, 2015 at 9:45a.m.

Dated: New York, New York November 4, 2014

VIRGINIA & AMBINDER, LLP

/s/ Lloyd R. Ambinder, Esq. LaDonna M. Lusher, Esq. Kara Miller, Esq. 40 Broad Street, 7th Floor New York, New York 10004 Tel: (212) 943-9080

Fax: (212) 943-9080 Fax: (212) 943-9082 lambinder@vandallp.com

LEEDS BROWN LAW, P.C.

/s/ Jeffrey K. Brown, Esq. Daniel H. Markowitz, Esq. Michael Tompkins, Esq. One Old Country Road Carle Place, New York 11514

Tel: (516) 873-9550 Fax: (516) 747-5024

jbrown@leedsbrownlaw.com

Attorneys for Plaintiffs and Putative Class

PROSKAUER ROSE LLP

/s/ Elise M. Bloom, Esq.
Mark W. Batten, Esq.
Noa M. Baddish, Esq.
Eleven Times Square
New York, New York 10036
Tel: (212) 969-3410
Fax: (212) 969-2900
ebloom@proskauer.com

Attorneys for Defendant

So ordered:	
Hon. George B. Daniels, U.S.D.J.	